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Christle D. Moreno and Brent Edward Moreno
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June 29, 2026

Via Certified Mail

Bret Jennings IV, Qualifying Broker
Keller Williams Realty Gulf Coast d/b/a KW Alabama Gulf Coast
Keller Williams AGC Realty - Orange Beach
4725 Main Street, Suite F228
Orange Beach, Alabama 36561
Email: bretjennings@kw.com

Donna Davis / Coastal Realty Group
c/o Keller Williams AGC Realty - Orange Beach
4725 Main Street, Suite F228
Orange Beach, Alabama 36561
Email: donnadavisoba@gmail.com

Re: Formal Notice of Claim; Demand for Immediate E&O / Professional Liability Carrier Tender; Donna Davis; Coastal Realty Group; Keller Williams Alabama Gulf Coast; Bayshore Towers

Dear Mr. Jennings, Ms. Davis, Coastal Realty Group, and Keller Williams Alabama Gulf Coast:

Please accept this correspondence, sent initially by email only with certified mail to follow, as formal notice of a claim arising from the conduct of Donna Davis, Coastal Realty Group, Keller Williams Realty Gulf Coast d/b/a KW Alabama Gulf Coast, Keller Williams AGC Realty - Orange Beach, and any supervising, qualifying, managing, affiliated, or responsible broker, licensee, agent, employee, office, team, or brokerage entity involved in the Bayshore Towers matter.

This letter is intended to place you on notice of a claim and to require immediate tender to all potentially applicable errors and omissions, professional liability, brokerage liability, general liability, umbrella, excess, and any other potentially responsive insurance carriers.

This is not merely a request for preservation. This is a demand that the matter be tendered.

The conduct at issue includes, but is not limited to, Donna Davis's involvement in the Bayshore Towers condominium matter; her relationship to Gary Davis, her husband and a Bayshore Towers board member; the overlap between her real estate activity and the Bayshore Towers

board/removal dispute; and the broader litigation-adjacent conduct involving me, my husband Brent Moreno, and parties connected to pending Baldwin County defamation litigation.

I am also aware that Paula Kennon now rents space out of the same office where Donna Davis works. Given the broader Orange Beach litigation, the public-records dispute involving Mayor Tony Kennon, and the overlapping relationships involved, that office-space connection is relevant to my forthcoming Alabama Real Estate Commission complaint, any civil claim analysis, and any coverage analysis.

On June 16, 2026, Donna Davis publicly posted that her prior Facebook profile had been deleted and that a new profile had been created. That same date is also the date Pickering's second set of discovery was filed and the date I received supplemental discovery in the Lueckemeyer defamation case. I am not stating that I presently have direct proof those events are causally connected. I am stating that the timing is material, suspicious, and relevant to the overall factual pattern.

A complaint to the Alabama Real Estate Commission is forthcoming. I am also evaluating all available civil remedies arising out of this conduct, including, but not limited to, claims relating to conflicts of interest, failure of disclosure, improper licensee conduct, broker supervision, participation in or facilitation of retaliatory or coercive HOA-related action, interference, reputational harm, and litigation-adjacent misconduct.

Accordingly, you are hereby directed to immediately tender this matter to every potentially applicable insurer.

Within seven (7) days of receipt of this letter, please provide the following in writing:

1. Confirmation that this matter has been tendered to all potentially applicable E&O, professional liability, brokerage liability, general liability, umbrella, excess, and other potentially responsive insurance carriers;
2. The date of tender to each carrier;
3. The claim number assigned by each carrier;
4. The name, mailing address, email address, and telephone number for each assigned adjuster, claims representative, agent, broker, or carrier representative;
5. The name of each insurer;
6. The policy number for each applicable or potentially applicable policy;
7. The effective dates for each policy, including any claims-made policy period, retroactive date, reporting period, extended reporting period, or tail coverage;
8. The limits of liability for each policy;
9. The deductible, retention, or self-insured retention for each policy;
10. A copy of the declarations page for each applicable or potentially applicable policy;
11. A copy of any reservation of rights, coverage-position letter, denial letter, or other communication from any carrier concerning this claim;
12. If any person or entity contends this matter has not been or will not be tendered, a written explanation identifying who made that decision, the basis for that decision, and the policy or factual grounds being relied upon.

Please also identify the qualifying broker and supervising broker responsible for Donna Davis during the relevant period and state whether your office contends Donna Davis was acting within the scope of her license, brokerage affiliation, office relationship, apparent authority, team role, or real estate practice when she showed, listed, marketed, discussed, communicated about, or otherwise participated in matters involving the Bayshore Towers condominium.

If you refuse to provide the requested insurance and claim-tender information voluntarily, please state that position clearly in writing so I may address it through the appropriate regulatory, discovery, subpoena, and litigation channels.

Please direct all written responses to me directly. I am not requesting social-media commentary, third-party communications, informal messages, or back-channel discussions.

Nothing in this correspondence should be interpreted as a complete statement of facts, claims, damages, parties, witnesses, exhibits, legal theories, or available remedies. This letter does not waive any claim, remedy, privilege, complaint, discovery right, subpoena right, regulatory right, insurance-related right, or cause of action available to me, my husband, or any related party.

Please govern yourselves accordingly.

A response IS required.

Sincerely,

Christle (C.C.) Dixon Moreno
Brent Edward Moreno
Unit 103, Bayshore Towers